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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

PAR PHARMACEUTICAL, INC.,

Debtor.

Fed. Tax Id. No. 22-2228342

Chapter 11

Case No. 22-22546 (___)

In re

ACTIENT PHARMACEUTICALS LLC,

Debtor.

Fed. Tax Id. No. 27-2717232

Chapter 11

Case No. 22-22547 (___)

In re

70 MAPLE AVENUE, LLC,

Debtor.

Fed. Tax Id. No. 90-0951491

Chapter 11

Case No. 22-22548 (___)

In re

ENDO INTERNATIONAL plc,

Debtor.

Fed. Tax Id. No. 68-0683755

Chapter 11

Case No. 22-22549 (___)

In re

ENDO VENTURES LIMITED,

Debtor.

Fed. Tax Id. No. 98-1156029

Chapter 11

Case No. 22-22550 (___)

In re

ANCHEN INCORPORATED,

Debtor.

Fed. Tax Id. No. 20-2008760

Chapter 11

Case No. 22-22552 (___)

In re

GENERICS INTERNATIONAL (US), INC.,

Debtor.

Fed. Tax Id. No. 26-1166489

Chapter 11

Case No. 22-22554 (___)

In re

ANCHEN PHARMACEUTICALS, INC.,

Debtor.

Fed. Tax Id. No. 68-0519179

Chapter 11

Case No. 22-22556 (___)

In re

DAVA PHARMACEUTICALS, LLC,

Debtor.

Fed. Tax Id. No. 20-1207354

Chapter 11

Case No. 22-22558 (___)

In re

**ENDO PAR INNOVATION COMPANY,
LLC,**

Debtor.

Fed. Tax Id. No. 81-1532435

Chapter 11

Case No. 22-22561 (___)

In re

GENERIC BIDCO I, LLC,

Debtor.

Fed. Tax Id. No. 26-1166905

Chapter 11

Case No. 22-22563 (___)

In re

INNOTEQ, INC.,

Debtor.

Fed. Tax Id. No. 26-3273381

Chapter 11

Case No. 22-22565 (___)

In re

JHP ACQUISITION, LLC,

Debtor.

Fed. Tax Id. No. 36-4747861

Chapter 11

Case No. 22-22567 (___)

In re

JHP GROUP HOLDINGS, LLC,

Debtor.

Fed. Tax Id. No. 37-1707688

Chapter 11

Case No. 22-22569 (___)

In re

KALI LABORATORIES, LLC,

Debtor.

Fed. Tax Id. No. 22-3494898

Chapter 11

Case No. 22-22572 (___)

In re

MOORES MILL PROPERTIES L.L.C.,

Debtor.

Fed. Tax Id. No. 26-1309523

Chapter 11

Case No. 22-22574 (___)

In re

**PAR PHARMACEUTICAL COMPANIES,
INC.,**

Debtor.

Fed. Tax Id. No. 81-3078301

Chapter 11

Case No. 22-22576 (___)

In re

**PAR PHARMACEUTICAL HOLDINGS,
INC.,**

Debtor.

Fed. Tax Id. No. 77-0723135

Chapter 11

Case No. 22-22578 (___)

In re

PAR STERILE PRODUCTS, LLC,

Debtor.

Fed. Tax Id. No. 26-0220105

Chapter 11

Case No. 22-22580 (___)

In re

PAR, LLC,

Debtor.

Fed. Tax Id. No. 20-0011286

Chapter 11

Case No. 22-22582 (___)

In re

**QUARTZ SPECIALTY
PHARMACEUTICALS, LLC,**

Debtor.

Fed. Tax Id. No. 63-1255368

Chapter 11

Case No. 22-22584 (___)

In re

VINTAGE PHARMACEUTICALS, LLC,

Debtor.

Fed. Tax Id. No. 63-1257882

Chapter 11

Case No. 22-22586 (___)

In re

ACTIENT THERAPEUTICS LLC,

Debtor.

Fed. Tax Id. No. 45-4102019

Chapter 11

Case No. 22-22588 (___)

In re

**ASTORA WOMEN'S HEALTH IRELAND
LIMITED,**

Debtor.

Fed. Tax Id. No. 52-2035829

Chapter 11

Case No. 22-22591 (___)

In re

ASTORA WOMEN'S HEALTH, LLC,

Debtor.

Fed. Tax Id. No. 47-3330427

Chapter 11

Case No. 22-22594 (___)

In re

**AUXILIUM INTERNATIONAL
HOLDINGS, LLC,**

Debtor.

Fed. Tax Id. No. 26-1629643

Chapter 11

Case No. 22-22596 (___)

In re

AUXILIUM PHARMACEUTICALS, LLC,

Debtor.

Fed. Tax Id. No. 23-3016883

Chapter 11

Case No. 22-22598 (___)

In re

AUXILIUM US HOLDINGS, LLC,

Debtor.

Fed. Tax Id. No. 26-1628967

Chapter 11

Case No. 22-22601 (___)

In re

**BERMUDA ACQUISITION
MANAGEMENT LIMITED,**

Debtor.

Fed. Tax Id. No. N/A

Chapter 11

Case No. 22-22603 (___)

In re

BIOSPECIFICS TECHNOLOGIES LLC,

Debtor.

Fed. Tax Id. No. 11-3054851

Chapter 11

Case No. 22-22605 (___)

In re

**BRANDED OPERATIONS HOLDINGS,
INC.,**

Debtor.

Fed. Tax Id. No. 85-3936945

Chapter 11

Case No. 22-22608 (___)

In re

DAVA INTERNATIONAL, LLC,

Debtor.

Fed. Tax Id. No. 34-1969945

Chapter 11

Case No. 22-22610 (___)

In re

ENDO AESTHETICS LLC,

Debtor.

Fed. Tax Id. No. 84-3630218

Chapter 11

Case No. 22-22613 (___)

In re

ENDO BERMUDA FINANCE LIMITED,

Debtor.

Fed. Tax Id. No. 98-1254093

Chapter 11

Case No. 22-22615 (___)

In re

**ENDO DESIGNATED ACTIVITY
COMPANY,**

Debtor.

Fed. Tax Id. No. 98-1147135

Chapter 11

Case No. 22-22551 (___)

In re

**ENDO EUROFIN UNLIMITED
COMPANY,**

Debtor.

Fed. Tax Id. No. 98-1522009

Chapter 11

Case No. 22-22553 (___)

In re

**ENDO FINANCE IV UNLIMITED
COMPANY,**

Debtor.

Fed. Tax Id. No. 98-1262779

Chapter 11

Case No. 22-22555 (___)

In re

ENDO FINANCE LLC,

Debtor.

Fed. Tax Id. No. 46-4766481

Chapter 11

Case No. 22-22557 (___)

In re

ENDO FINANCE OPERATIONS LLC,

Debtor.

Fed. Tax Id. No. 82-1446355

Chapter 11

Case No. 22-22559 (___)

In re

ENDO FINCO INC.,

Debtor.

Fed. Tax Id. No. 46-4765794

Chapter 11

Case No. 22-22560 (___)

In re

ENDO GENERICS HOLDINGS, INC.,

Debtor.

Fed. Tax Id. No. 46-0634834

Chapter 11

Case No. 22-22562 (___)

In re

ENDO GLOBAL AESTHETICS LIMITED,

Debtor.

Fed. Tax Id. No. 98-1462898

Chapter 11

Case No. 22-22564 (___)

In re

ENDO GLOBAL BIOLOGICS LIMITED,

Debtor.

Fed. Tax Id. No. 98-1462735

Chapter 11

Case No. 22-22566 (___)

In re

**ENDO GLOBAL DEVELOPMENT
LIMITED,**

Debtor.

Fed. Tax Id. No. 98-1494785

Chapter 11

Case No. 22-22568 (___)

In re

ENDO GLOBAL FINANCE LLC,

Debtor.

Fed. Tax Id. No. 38-4007754

Chapter 11

Case No. 22-22570 (___)

In re

ENDO GLOBAL VENTURES,

Debtor.

Fed. Tax Id. No. 98-1224244

Chapter 11

Case No. 22-22571 (___)

In re

ENDO HEALTH SOLUTIONS INC.,

Debtor.

Fed. Tax Id. No. 13-4022871

Chapter 11

Case No. 22-22573 (___)

In re

ENDO INNOVATION VALERA, LLC,

Debtor.

Fed. Tax Id. No. 83-0973622

Chapter 11

Case No. 22-22575 (___)

In re

ENDO IRELAND FINANCE II LIMITED,

Debtor.

Fed. Tax Id. No. 98-1300535

Chapter 11

Case No. 22-22577 (___)

In re

ENDO LLC,

Debtor.

Fed. Tax Id. No. 46-4266640

Chapter 11

Case No. 22-22579 (___)

In re

**ENDO LUXEMBOURG FINANCE
COMPANY I S.à r.l.,**

Debtor.

Fed. Tax Id. No. 98-1143863

Chapter 11

Case No. 22-22581 (___)

In re

**ENDO LUXEMBOURG HOLDING
COMPANY S.à.r.l.,**

Debtor.

Fed. Tax Id. No. 98-1147168

Chapter 11

Case No. 22-22583 (___)

In re

**ENDO LUXEMBOURG
INTERNATIONAL FINANCING S.à.r.l.,**

Debtor.

Fed. Tax Id. No. 98-1402905

Chapter 11

Case No. 22-22585 (___)

In re

ENDO MANAGEMENT LIMITED,

Debtor.

Fed. Tax Id. No. 98-1154866

Chapter 11

Case No. 22-22587 (___)

In re

**ENDO PHARMACEUTICALS FINANCE
LLC,**

Debtor.

Fed. Tax Id. No. 82-1445768

Chapter 11

Case No. 22-22589 (___)

In re

ENDO PHARMACEUTICALS INC.,

Debtor.

Fed. Tax Id. No. 52-2035829

Chapter 11

Case No. 22-22590 (___)

In re

**ENDO PHARMACEUTICALS
SOLUTIONS INC.,**

Debtor.

Fed. Tax Id. No. 04-3047911

Chapter 11

Case No. 22-22592 (___)

In re

**ENDO PHARMACEUTICALS VALERA
INC.,**

Debtor.

Fed. Tax Id. No. 13-4119931

Chapter 11

Case No. 22-22593 (___)

In re

**ENDO PROCUREMENT OPERATIONS
LIMITED,**

Debtor.

Fed. Tax Id. No. 98-1477840

Chapter 11

Case No. 22-22595 (___)

In re

ENDO TOPFIN LIMITED,

Debtor.

Fed. Tax Id. No. 98-1248086

Chapter 11

Case No. 22-22597 (___)

In re

ENDO U.S. INC.,

Debtor.

Fed. Tax Id. No. 46-4710786

Chapter 11

Case No. 22-22599 (___)

In re

**ENDO US HOLDINGS LUXEMBOURG I
S.à.r.l.,**

Debtor.

Fed. Tax Id. No. 98-1247910

Chapter 11

Case No. 22-22600 (___)

In re

**ENDO VENTURES AESTHETICS
LIMITED,**

Debtor.

Fed. Tax Id. No. 98-1529967

Chapter 11

Case No. 22-22602 (___)

In re

ENDO VENTURES BERMUDA LIMITED,

Debtor.

Fed. Tax Id. No. 98-1160688

Chapter 11

Case No. 22-22604 (___)

In re

ENDO VENTURES CYPRUS LIMITED,

Debtor.

Fed. Tax Id. No. 98-1231544

Chapter 11

Case No. 22-22606 (___)

In re

**GENERICS INTERNATIONAL (US) 2,
INC.,**

Debtor.

Fed. Tax Id. No. 30-0945075

Chapter 11

Case No. 22-22607 (___)

In re

**GENERICS INTERNATIONAL
VENTURES ENTERPRISES LLC,**

Debtor.

Fed. Tax Id. No. 83-1584685

Chapter 11

Case No. 22-22609 (___)

In re

**HAWK ACQUISITION IRELAND
LIMITED,**

Debtor.

Fed. Tax Id. No. 98-1244776

Chapter 11

Case No. 22-22611 (___)

In re

KALI LABORATORIES 2, INC.,

Debtor.

Fed. Tax Id. No. 61-1796751

Chapter 11

Case No. 22-22612 (___)

In re

**LUXEMBOURG ENDO SPECIALTY
PHARMACEUTICALS HOLDING I
S.à r.l.,**

Debtor.

Fed. Tax Id. No. 98-1300601

Chapter 11

Case No. 22-22614 (___)

In re

**PALADIN LABS CANADIAN HOLDING
INC.,**

Debtor.

No Fed. Tax Id. No. N/A

Chapter 11

Case No. 22-22616 (___)

In re

PALADIN LABS INC.,

Debtor.

Fed. Tax Id. No. 98-1181410

Chapter 11

Case No. 22-22617 (___)

In re

PAR LABORATORIES EUROPE, LTD.,

Debtor.

Fed. Tax Id. No. 98-1319597

Chapter 11

Case No. 22-22618 (___)

In re

PAR PHARMACEUTICAL 2, INC.,

Debtor.

Fed. Tax Id. No. 30-0944895

Chapter 11

Case No. 22-22619 (___)

In re

SLATE PHARMACEUTICALS, LLC,

Debtor.

Fed. Tax Id. No. 26-0456201

Chapter 11

Case No. 22-22620 (___)

In re

TIMM MEDICAL HOLDINGS, LLC,

Debtor.

Fed. Tax Id. No. 27-0468744

Chapter 11

Case No. 22-22621 (___)

**MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER
(I) DIRECTING JOINT ADMINISTRATION OF THE CHAPTER 11
CASES PURSUANT TO BANKRUPTCY RULE 1015(b); (II) WAIVING
THE REQUIREMENTS OF SECTION 342(c)(1) OF THE BANKRUPTCY CODE
AND BANKRUPTCY RULE 2002(n); AND (III) GRANTING RELATED RELIEF**

Endo International plc and its debtor affiliates, as debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), respectfully represent in support of this motion (this “Motion”) as follows:

RELIEF REQUESTED

1. By this Motion, and pursuant to sections 105(a) and 342(c)(1) of title 11 of the United States Code (the “Bankruptcy Code”), Rules 1015(b) and 2002(n) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 9013-1(b) of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), the Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), (a) directing joint administration of the Chapter 11 Cases pursuant to Bankruptcy Rule 1015(b), (b) waiving the requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rule 2002(n), and (c) granting related relief.

JURISDICTION AND VENUE

2. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.). This is a core proceeding pursuant to 28 U.S.C. § 157(b).

3. Venue of the Chapter 11 Cases and this Motion is proper in this district under 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

I. General Background

4. On the date hereof (the “Petition Date”), the Debtors each commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code.

5. The Debtors are authorized to continue to operate their businesses and manage their properties as debtors and debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. No trustee, examiner, or statutory committee of creditors has been appointed in the Chapter 11 Cases.

7. Additional information regarding the Debtors, including their business operations, their corporate and capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Mark Bradley in Support of Chapter 11 Petitions and First Day Papers* (the “First Day Declaration”) filed contemporaneously herewith and incorporated herein by reference.

BASIS FOR RELIEF

8. Bankruptcy Rule 1015(b) provides, in relevant part, that “[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015(b). The Debtors consist

of 75 “affiliates” as that term is defined in section 101(2) of the Bankruptcy Code and Bankruptcy Rule 1015(b). Operationally, the Debtors function in complementary respects within their respective business lines—Branded Pharmaceuticals, Sterile Injectables, Generic Pharmaceuticals, and International Pharmaceuticals (each as defined and further described in the First Day Declaration)—to run their businesses as a specialty pharmaceutical company committed to providing high quality and effective pharmaceutical products. This Court, therefore, is authorized to consolidate the Debtors’ cases for procedural purposes.

9. The First Day Declaration establishes that joint administration is warranted here in view of the benefits it will afford to the Court, the Debtors, and all parties-in-interest. Further, joint administration will not adversely affect the Debtors’ respective constituencies because this Motion seeks only administrative combination, and not substantive consolidation of the Debtors’ estates. Thus, the Debtors submit that joint administration of the Chapter 11 Cases is in the best interests of their estates, their creditors, and all parties-in-interest.

10. Moreover, the joint administration of the Chapter 11 Cases will permit the Clerk of the Court (the “Clerk”) to use a single general docket for each of the Debtors’ Chapter 11 Cases and to combine notices to creditors and other parties-in-interest of the Debtors’ respective estates. Joint administration will therefore ease the burden on the United States Trustee for the Southern District of New York (the “U.S. Trustee”) in supervising the Chapter 11 Cases.

11. No party will be prejudiced by the relief requested in this Motion. Specifically, the relief sought herein is solely procedural and is not intended to affect substantive rights. Each creditor and other party-in-interest will maintain whatever rights it has against the particular estate in which it allegedly has a claim or right.

12. Finally, the Debtors submit that use of the simplified caption, without reference to the Debtors' tax identification numbers, addresses, and previous names, will eliminate cumbersome and confusing procedures and ensure uniformity of pleading identification. Other case-specific information will be listed in the petitions for the respective Debtors and such petitions are publicly available, including on the restructuring website maintained by the Debtors that is free to access, and will be provided by the Debtors upon request. Therefore, the Debtors submit the policies behind the requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n) have been fully satisfied.

13. In furtherance of the foregoing, the Debtors request that the official caption to be used by all parties in all pleadings in the jointly administered cases be as follows:

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

ENDO INTERNATIONAL plc, et al.,

Debtors.¹

Chapter 11

Case No. 22-22549 (___)

14. The Debtors further request the Court's direction that a notation substantially similar to the following language be entered on the docket maintained by the Clerk of the Court to reflect the joint administration of the Chapter 11 Cases:

¹ The last four digits of Debtor Endo International plc's tax identification number are 3755. Due to the large number of debtors in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/Endo>. The location of the Debtors' service address for purposes of these chapter 11 cases is: 1400 Atwater Drive, Malvern, PA 19355.

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural consolidation and joint administration of the chapter 11 cases of Endo International plc and its affiliates that have concurrently commenced chapter 11 cases. The docket in the chapter 11 case of Endo International plc (3755), Case No. 22-22549 (___), should be consulted for all matters affecting the chapter 11 cases of: 70 Maple Avenue, LLC (1491); Actient Pharmaceuticals LLC (7232); Actient Therapeutics LLC (2019); Anchen Incorporated (8760); Anchen Pharmaceuticals, Inc. (9179); Astora Women's Health Ireland Limited (5829); Astora Women's Health, LLC (0427); Auxilium International Holdings, LLC (9643); Auxilium Pharmaceuticals, LLC (6883); Auxilium US Holdings, LLC (8967); Bermuda Acquisition Management Limited (N/A); BioSpecifics Technologies LLC (4851); Branded Operations Holdings, Inc. (6945); DAVA International, LLC (9945); DAVA Pharmaceuticals, LLC (7354); Endo Aesthetics LLC (0218); Endo Bermuda Finance Limited (4093); Endo Designated Activity Company (7135); Endo Eurofin Unlimited Company (2009); Endo Finance IV Unlimited Company (2779); Endo Finance LLC (6481); Endo Finance Operations LLC (6355); Endo Finco Inc. (5794); Endo Generics Holdings, Inc. (4834); Endo Global Aesthetics Limited (2898); Endo Global Biologics Limited (2735); Endo Global Development Limited (4785); Endo Global Finance LLC (7754); Endo Global Ventures (4244); Endo Health Solutions Inc. (2871); Endo Innovation Valera, LLC (3622); Endo Ireland Finance II Limited (0535); Endo LLC (6640); Endo Luxembourg Finance Company I S.à r.l. (3863); Endo Luxembourg Holding Company S.à r.l. (7168); Endo Luxembourg International Financing S.à r.l. (2905); Endo Management Limited (4866); Endo Par Innovation Company, LLC (2435); Endo Pharmaceuticals Finance LLC (5768); Endo Pharmaceuticals Inc. (5829); Endo Pharmaceuticals Solutions Inc. (7911); Endo Pharmaceuticals Valera Inc. (9931); Endo Procurement Operations Limited (7840); Endo TopFin Limited (8086); Endo U.S. Inc. (0786); Endo US Holdings Luxembourg I S.à r.l. (7910); Endo Ventures Aesthetics Limited (9967); Endo Ventures Bermuda Limited (0688); Endo Ventures Cyprus Limited (1544); Endo Ventures Limited (6029); Generics Bidco I, LLC (6905); Generics International (US) 2, Inc. (5075); Generics International (US), Inc. (6489); Generics International Ventures Enterprises LLC (4685); Hawk Acquisition Ireland Limited (4776); Innoteq, Inc. (3381); JHP Acquisition, LLC (7861); JHP Group Holdings, LLC (7688); Kali Laboratories 2, Inc. (6751); Kali Laboratories, LLC (4898); Luxembourg Endo Specialty Pharmaceuticals Holding I S.à r.l. (0601); Moores Mill Properties L.L.C. (9523); Paladin Labs Canadian Holding Inc. (N/A); Paladin Labs Inc. (1410); Par Laboratories Europe, Ltd. (9597); Par Pharmaceutical 2, Inc. (4895); Par Pharmaceutical Companies, Inc. (8301); Par Pharmaceutical Holdings, Inc. (3135); Par Pharmaceutical, Inc. (8342); Par Sterile Products, LLC (0105); Par, LLC (1286); Quartz Specialty Pharmaceuticals, LLC (5368); Slate Pharmaceuticals, LLC (6201); Timm Medical Holdings, LLC (8744); and Vintage Pharmaceuticals, LLC (7882).

15. Courts in this district have granted similar relief in other chapter 11 cases. *See, e.g., In re JCK Legacy Company*, Case No. 20-10418 (MEW) (Bankr. S.D.N.Y. Feb. 14, 2020) [Docket No. 59]; *In re Purdue Pharma L.P.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y. Sept. 18, 2019) [Docket No. 59]; *In re Barneys N.Y., Inc.*, No. 19-36300 (CGM) (Bankr. S.D.N.Y. Aug. 7, 2019) [Docket No. 41]; *In re Stearns Holdings, LLC*, No. 19-12226 (SCC) (Bankr. S.D.N.Y. July 10, 2019) [Docket No. 74]; *In re New Cotai Holdings, LLC*, No. 19-22911 (RDD) (Bankr. S.D.N.Y. May 10, 2019) [Docket No. 23].²

16. For these reasons, the Debtors submit that the relief requested is necessary and appropriate, is in the best interest of their respective estates and creditors, and should be granted in all respects.

NOTICE

17. Notice of this Motion shall be given to (a) the U.S. Trustee; (b) counsel to the administrative agent under the Debtors' prepetition credit agreement; (c) counsel to the indenture trustee under each of the Debtors' outstanding bond issuances; (d) Gibson, Dunn & Crutcher LLP, as counsel to the Ad Hoc First Lien Group (as defined in the First Day Declaration); (e) Paul, Weiss, Rifkind, Wharton & Garrison LLP, as counsel to the Ad Hoc Cross-Holder Group (as defined in the First Day Declaration); (f) the U.S. Attorney for the Southern District of New York; (g) the attorneys general for all 50 states and the District of Columbia; (h) the Debtors' 50 largest unsecured creditors on a consolidated basis; (i) the Internal Revenue Service; (j) the Securities and Exchange Commission; (k) the proposed future claimants representative in the Chapter 11 Cases; (m) any party that has requested notice pursuant to Bankruptcy Rule 2002; and

² Because of the voluminous nature of the orders cited herein, they are not attached to this Motion. Copies of these orders, however, are available on request.

(n) any other party entitled to notice pursuant to Local Rule 9013-1(b). The Debtors submit that no other or further notice need be provided.

NO PRIOR REQUEST

18. No prior request for the relief sought herein has been made to this or any other court.

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WHEREFORE, the Debtors respectfully request that this Court (a) enter the Proposed Order, substantially the form attached hereto as **Exhibit A**, and (b) grant such other and further relief as may be just and proper.

Dated: August 16, 2022
New York, New York

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/ Paul D. Leake
Paul D. Leake
Lisa Laukitis
Shana A. Elberg
Evan A. Hill
One Manhattan West
New York, New York 10001
Telephone: (212) 735-3000
Fax: (212) 735-2000

*Proposed Counsel for the Debtors
and Debtors in Possession*

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

PAR PHARMACEUTICAL, INC.,

Debtor.

Chapter 11

Case No. 22-22546 (___)

Fed. Tax Id. No. 22-2228342

In re

ACTIENT PHARMACEUTICALS LLC,

Debtor.

Chapter 11

Case No. 22-22547 (___)

Fed. Tax Id. No. 27-2717232

In re

70 MAPLE AVENUE, LLC,

Debtor.

Chapter 11

Case No. 22-22548 (___)

Fed. Tax Id. No. 90-0951491

In re

ENDO INTERNATIONAL plc,

Debtor.

Chapter 11

Case No. 22-22549 (___)

Fed. Tax Id. No. 68-0683755

In re

ENDO VENTURES LIMITED,

Debtor.

Chapter 11

Case No. 22-22550 (___)

Fed. Tax Id. No. 98-1156029

In re

ANCHEN INCORPORATED,

Debtor.

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Case No. 22-22552 (___)

In re

GENERICS INTERNATIONAL (US), INC.,

Debtor.

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Chapter 11

Case No. 22-22554 (___)

In re

ANCHEN PHARMACEUTICALS, INC.,

Debtor.

Fed. Tax Id. No. 68-0519179

Chapter 11

Case No. 22-22556 (___)

In re

DAVA PHARMACEUTICALS, LLC,

Debtor.

Fed. Tax Id. No. 20-1207354

Chapter 11

Case No. 22-22558 (___)

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**ENDO PAR INNOVATION COMPANY,
LLC,**

Debtor.

Fed. Tax Id. No. 81-1532435

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Case No. 22-22561 (___)

In re

GENERICS BIDCO I, LLC,

Debtor.

Fed. Tax Id. No. 26-1166905

Chapter 11

Case No. 22-22563 (___)

In re

INNOTEQ, INC.,

Debtor.

Fed. Tax Id. No. 26-3273381

Chapter 11

Case No. 22-22565 (___)

In re

JHP ACQUISITION, LLC,

Debtor.

Fed. Tax Id. No. 36-4747861

Chapter 11

Case No. 22-22567 (___)

In re

JHP GROUP HOLDINGS, LLC,

Debtor.

Fed. Tax Id. No. 37-1707688

Chapter 11

Case No. 22-22569 (___)

In re

KALI LABORATORIES, LLC,

Debtor.

Fed. Tax Id. No. 22-3494898

Chapter 11

Case No. 22-22572 (___)

In re

MOORES MILL PROPERTIES L.L.C.,

Debtor.

Fed. Tax Id. No. 26-1309523

Chapter 11

Case No. 22-22574 (___)

In re

**PAR PHARMACEUTICAL COMPANIES,
INC.,**

Debtor.

Fed. Tax Id. No. 81-3078301

Chapter 11

Case No. 22-22576 (___)

In re

**PAR PHARMACEUTICAL HOLDINGS,
INC.,**

Debtor.

Fed. Tax Id. No. 77-0723135

Chapter 11

Case No. 22-22578 (___)

In re

PAR STERILE PRODUCTS, LLC,

Debtor.

Fed. Tax Id. No. 26-0220105

Chapter 11

Case No. 22-22580 (___)

In re

PAR, LLC,

Debtor.

Fed. Tax Id. No. 20-0011286

Chapter 11

Case No. 22-22582 (___)

In re

**QUARTZ SPECIALTY
PHARMACEUTICALS, LLC,**

Debtor.

Fed. Tax Id. No. 63-1255368

Chapter 11

Case No. 22-22584 (___)

In re

VINTAGE PHARMACEUTICALS, LLC,

Debtor.

Fed. Tax Id. No. 63-1257882

Chapter 11

Case No. 22-22586 (___)

In re

ACTIENT THERAPEUTICS LLC,

Debtor.

Fed. Tax Id. No. 45-4102019

Chapter 11

Case No. 22-22588 (___)

In re

**ASTORA WOMEN'S HEALTH IRELAND
LIMITED,**

Debtor.

Fed. Tax Id. No. 52-2035829

Chapter 11

Case No. 22-22591 (___)

In re

ASTORA WOMEN'S HEALTH, LLC,

Debtor.

Fed. Tax Id. No. 47-3330427

Chapter 11

Case No. 22-22594 (___)

In re

**AUXILIUM INTERNATIONAL
HOLDINGS, LLC,**

Debtor.

Fed. Tax Id. No. 26-1629643

Chapter 11

Case No. 22-22596 (___)

In re

AUXILIUM PHARMACEUTICALS, LLC,

Debtor.

Fed. Tax Id. No. 23-3016883

Chapter 11

Case No. 22-22598 (___)

In re

AUXILIUM US HOLDINGS, LLC,

Debtor.

Fed. Tax Id. No. 26-1628967

Chapter 11

Case No. 22-22601 (___)

In re

**BERMUDA ACQUISITION
MANAGEMENT LIMITED,**

Debtor.

Fed. Tax Id. No. N/A

Chapter 11

Case No. 22-22603 (___)

In re

BIOSPECIFICS TECHNOLOGIES LLC,

Debtor.

Fed. Tax Id. No. 11-3054851

Chapter 11

Case No. 22-22605 (___)

In re

**BRANDED OPERATIONS HOLDINGS,
INC.,**

Debtor.

Fed. Tax Id. No. 85-3936945

Chapter 11

Case No. 22-22608 (___)

In re

DAVA INTERNATIONAL, LLC,

Debtor.

Fed. Tax Id. No. 34-1969945

Chapter 11

Case No. 22-22610 (___)

In re

ENDO AESTHETICS LLC,

Debtor.

Fed. Tax Id. No. 84-3630218

Chapter 11

Case No. 22-22613 (___)

In re

ENDO BERMUDA FINANCE LIMITED,

Debtor.

Fed. Tax Id. No. 98-1254093

Chapter 11

Case No. 22-22615 (___)

In re

**ENDO DESIGNATED ACTIVITY
COMPANY,**

Debtor.

Fed. Tax Id. No. 98-1147135

Chapter 11

Case No. 22-22551 (___)

In re

**ENDO EUROFIN UNLIMITED
COMPANY,**

Debtor.

Fed. Tax Id. No. 98-1522009

Chapter 11

Case No. 22-22553 (___)

In re

**ENDO FINANCE IV UNLIMITED
COMPANY,**

Debtor.

Fed. Tax Id. No. 98-1262779

Chapter 11

Case No. 22-22555 (___)

In re

ENDO FINANCE LLC,

Debtor.

Fed. Tax Id. No. 46-4766481

Chapter 11

Case No. 22-22557 (___)

In re

ENDO FINANCE OPERATIONS LLC,

Debtor.

Fed. Tax Id. No. 82-1446355

Chapter 11

Case No. 22-22559 (___)

In re

ENDO FINCO INC.,

Debtor.

Fed. Tax Id. No. 46-4765794

Chapter 11

Case No. 22-22560 (___)

In re

ENDO GENERICS HOLDINGS, INC.,

Debtor.

Fed. Tax Id. No. 46-0634834

Chapter 11

Case No. 22-22562(____)

In re

ENDO GLOBAL AESTHETICS LIMITED,

Debtor.

Fed. Tax Id. No. 98-1462898

Chapter 11

Case No. 22-22564 (____)

In re

ENDO GLOBAL BIOLOGICS LIMITED,

Debtor.

Fed. Tax Id. No. 98-1462735

Chapter 11

Case No. 22-22566 (____)

In re

**ENDO GLOBAL DEVELOPMENT
LIMITED,**

Debtor.

Fed. Tax Id. No. 98-1494785

Chapter 11

Case No. 22-22568 (____)

In re

ENDO GLOBAL FINANCE LLC,

Debtor.

Fed. Tax Id. No. 38-4007754

Chapter 11

Case No. 22-22570 (____)

In re

ENDO GLOBAL VENTURES,

Debtor.

Fed. Tax Id. No. 98-1224244

Chapter 11

Case No. 22-22571 (___)

In re

ENDO HEALTH SOLUTIONS INC.,

Debtor.

Fed. Tax Id. No. 13-4022871

Chapter 11

Case No. 22-22573 (___)

In re

ENDO INNOVATION VALERA, LLC,

Debtor.

Fed. Tax Id. No. 83-0973622

Chapter 11

Case No. 22-22575 (___)

In re

ENDO IRELAND FINANCE II LIMITED,

Debtor.

Fed. Tax Id. No. 98-1300535

Chapter 11

Case No. 22-22577 (___)

In re

ENDO LLC,

Debtor.

Fed. Tax Id. No. 46-4266640

Chapter 11

Case No. 22-22579 (___)

In re

**ENDO LUXEMBOURG FINANCE
COMPANY I S.à r.l.,**

Debtor.

Fed. Tax Id. No. 98-1143863

Chapter 11

Case No. 22-22581 (___)

In re

**ENDO LUXEMBOURG HOLDING
COMPANY S.à.r.l.,**

Debtor.

Fed. Tax Id. No. 98-1147168

Chapter 11

Case No. 22-22583 (___)

In re

**ENDO LUXEMBOURG
INTERNATIONAL FINANCING S.à.r.l.,**

Debtor.

Fed. Tax Id. No. 98-1402905

Chapter 11

Case No. 22-22585 (___)

In re

ENDO MANAGEMENT LIMITED,

Debtor.

Fed. Tax Id. No. 98-1154866

Chapter 11

Case No. 22-22587 (___)

In re

**ENDO PHARMACEUTICALS FINANCE
LLC,**

Debtor.

Fed. Tax Id. No. 82-1445768

Chapter 11

Case No. 22-22589 (___)

In re

ENDO PHARMACEUTICALS INC.,

Debtor.

Fed. Tax Id. No. 52-2035829

Chapter 11

Case No. 22-22590 (___)

In re

**ENDO PHARMACEUTICALS
SOLUTIONS INC.,**

Debtor.

Fed. Tax Id. No. 04-3047911

Chapter 11

Case No. 22-22592 (___)

In re

**ENDO PHARMACEUTICALS VALERA
INC.,**

Debtor.

Fed. Tax Id. No. 13-4119931

Chapter 11

Case No. 22-22593 (___)

In re

**ENDO PROCUREMENT OPERATIONS
LIMITED,**

Debtor.

Fed. Tax Id. No. 98-1477840

Chapter 11

Case No. 22-22595 (___)

In re

ENDO TOPFIN LIMITED,

Debtor.

Fed. Tax Id. No. 98-1248086

Chapter 11

Case No. 22-22597 (___)

In re

ENDO U.S. INC.,

Debtor.

Fed. Tax Id. No. 46-4710786

Chapter 11

Case No. 22-22599 (___)

In re

**ENDO US HOLDINGS LUXEMBOURG I
S.à.r.l.,**

Debtor.

Fed. Tax Id. No. 98-1247910

Chapter 11

Case No. 22-22600 (___)

In re

**ENDO VENTURES AESTHETICS
LIMITED,**

Debtor.

Fed. Tax Id. No. 98-1529967

Chapter 11

Case No. 22-22602 (___)

In re

ENDO VENTURES BERMUDA LIMITED,

Debtor.

Fed. Tax Id. No. 98-1160688

Chapter 11

Case No. 22-22604 (___)

In re

ENDO VENTURES CYPRUS LIMITED,

Debtor.

Fed. Tax Id. No. 98-1231544

Chapter 11

Case No. 22-22606 (___)

In re

**GENERICS INTERNATIONAL (US) 2,
INC.,**

Debtor.

Fed. Tax Id. No. 30-0945075

Chapter 11

Case No. 22-22607 (___)

In re

**GENERICS INTERNATIONAL
VENTURES ENTERPRISES LLC,**

Debtor.

Fed. Tax Id. No. 83-1584685

Chapter 11

Case No. 22-22609 (___)

In re

**HAWK ACQUISITION IRELAND
LIMITED,**

Debtor.

Fed. Tax Id. No. 98-1244776

Chapter 11

Case No. 22-22611 (___)

In re

KALI LABORATORIES 2, INC.,

Debtor.

Fed. Tax Id. No. 61-1796751

Chapter 11

Case No. 22-22612 (___)

In re

**LUXEMBOURG ENDO SPECIALTY
PHARMACEUTICALS HOLDING I
S.à r.l.,**

Debtor.

Fed. Tax Id. No. 98-1300601

Chapter 11

Case No. 22-22614 (___)

In re

**PALADIN LABS CANADIAN HOLDING
INC.,**

Debtor.

No Fed. Tax Id. No. N/A

Chapter 11

Case No. 22-22616 (___)

In re

PALADIN LABS INC.,

Debtor.

Fed. Tax Id. No. 98-1181410

Chapter 11

Case No. 22-22617 (___)

In re

PAR LABORATORIES EUROPE, LTD.,

Debtor.

Fed. Tax Id. No. 98-1319597

Chapter 11

Case No. 22-22618 (___)

In re

PAR PHARMACEUTICAL 2, INC.,

Debtor.

Fed. Tax Id. No. 30-0944895

Chapter 11

Case No. 22-22619 (___)

In re

SLATE PHARMACEUTICALS, LLC,

Debtor.

Fed. Tax Id. No. 26-0456201

Chapter 11

Case No. 22-22620 (___)

In re

TIMM MEDICAL HOLDINGS, LLC,

Debtor.

Fed. Tax Id. No. 27-0468744

Chapter 11

Case No. 22-22621 (___)

**ORDER (I) DIRECTING JOINT ADMINISTRATION
OF THE CHAPTER 11 CASES PURSUANT TO BANKRUPTCY RULE 1015(b);
(II) WAIVING THE REQUIREMENTS OF SECTION 342(c)(1) OF THE BANKRUPTCY
CODE AND BANKRUPTCY RULE 2002(n); AND (III) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)¹ of the debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned cases (the “Chapter 11 Cases”) for the entry of an order (this “Order”) (a) directing joint administration of the Chapter 11 Cases pursuant to Bankruptcy Rule 1015(b), (b) waiving the requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rule 2002(n), and (c) granting related relief, all as more fully set out in the Motion; and the Court having reviewed the Motion and the First Day Declaration and having heard the statements of counsel regarding the relief requested in the Motion at a hearing before the Court (the “Hearing”); and the Court having found that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); (c) venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and (d) due and proper notice of the Motion and the Hearing was sufficient under the circumstances; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and that such relief is in the best interests of the Debtors, their estates,

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

creditors, and all parties-in-interest; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED solely to the extent set forth herein.
2. Each of the Chapter 11 Cases is consolidated for procedural purposes only and shall be jointly administered by the Court.
3. Nothing contained in this Order shall be deemed or construed as directing or otherwise effecting any substantive consolidation of any of the Chapter 11 Cases.
4. The caption of the jointly administered Chapter 11 Cases shall read as follows:

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

ENDO INTERNATIONAL plc, et al.,

Debtors.¹

Chapter 11

Case No. 22-22549 (___)

5. All original pleadings shall be captioned as indicated in the preceding decretal paragraph, and all original docket entries shall be made in the case of Endo International plc, Case No. 22-22549 (___).

¹ The last four digits of Debtor Endo International plc's tax identification number are 3755. Due to the large number of debtors in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/Endo>. The location of the Debtors' service address for purposes of these chapter 11 cases is: 1400 Atwater Drive, Malvern, PA 19355.

6. Docket entries shall be made on the docket of each of the Chapter 11 Cases

(except that of Endo International plc) substantially as follows:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural consolidation and joint administration of the chapter 11 cases of Endo International plc and its affiliates that have concurrently commenced chapter 11 cases. The docket in the chapter 11 case of Endo International plc (3755), Case No. 22-22549 (___), should be consulted for all matters affecting the chapter 11 cases of: 70 Maple Avenue, LLC (1491); Actient Pharmaceuticals LLC (7232); Actient Therapeutics LLC (2019); Anchen Incorporated (8760); Anchen Pharmaceuticals, Inc. (9179); Astora Women's Health Ireland Limited (5829); Astora Women's Health, LLC (0427); Auxilium International Holdings, LLC (9643); Auxilium Pharmaceuticals, LLC (6883); Auxilium US Holdings, LLC (8967); Bermuda Acquisition Management Limited (N/A); BioSpecifics Technologies LLC (4851); Branded Operations Holdings, Inc. (6945); DAVA International, LLC (9945); DAVA Pharmaceuticals, LLC (7354); Endo Aesthetics LLC (0218); Endo Bermuda Finance Limited (4093); Endo Designated Activity Company (7135); Endo Eurofin Unlimited Company (2009); Endo Finance IV Unlimited Company (2779); Endo Finance LLC (6481); Endo Finance Operations LLC (6355); Endo Finco Inc. (5794); Endo Generics Holdings, Inc. (4834); Endo Global Aesthetics Limited (2898); Endo Global Biologics Limited (2735); Endo Global Development Limited (4785); Endo Global Finance LLC (7754); Endo Global Ventures (4244); Endo Health Solutions Inc. (2871); Endo Innovation Valera, LLC (3622); Endo Ireland Finance II Limited (0535); Endo LLC (6640); Endo Luxembourg Finance Company I S.à r.l. (3863); Endo Luxembourg Holding Company S.à.r.l. (7168); Endo Luxembourg International Financing S.à.r.l. (2905); Endo Management Limited (4866); Endo Par Innovation Company, LLC (2435); Endo Pharmaceuticals Finance LLC (5768); Endo Pharmaceuticals Inc. (5829); Endo Pharmaceuticals Solutions Inc. (7911); Endo Pharmaceuticals Valera Inc. (9931); Endo Procurement Operations Limited (7840); Endo TopFin Limited (8086); Endo U.S. Inc. (0786); Endo US Holdings Luxembourg I S.à.r.l. (7910); Endo Ventures Aesthetics Limited (9967); Endo Ventures Bermuda Limited (0688); Endo Ventures Cyprus Limited (1544); Endo Ventures Limited (6029); Generics Bidco I, LLC (6905); Generics International (US) 2, Inc. (5075); Generics International (US), Inc. (6489); Generics International Ventures Enterprises LLC (4685); Hawk Acquisition Ireland Limited (4776); Innoteq, Inc. (3381); JHP Acquisition, LLC (7861); JHP Group Holdings, LLC (7688); Kali Laboratories 2, Inc. (6751); Kali Laboratories, LLC (4898); Luxembourg Endo Specialty Pharmaceuticals Holding I S.à r.l. (0601); Moores Mill Properties L.L.C. (9523); Paladin Labs Canadian Holding Inc. (N/A); Paladin Labs Inc. (1410); Par Laboratories Europe, Ltd. (9597); Par Pharmaceutical 2, Inc. (4895); Par Pharmaceutical Companies, Inc. (8301); Par Pharmaceutical Holdings, Inc. (3135); Par Pharmaceutical, Inc. (8342); Par Sterile Products, LLC (0105); Par, LLC (1286); Quartz Specialty

Pharmaceuticals, LLC (5368); Slate Pharmaceuticals, LLC (6201); Timm Medical Holdings, LLC (8744); and Vintage Pharmaceuticals, LLC (7882).

7. The requirements under section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rule 2002(n) that the case caption and other notices mailed in the Chapter 11 Cases include the Debtors' tax identification numbers and other identifying information about the Debtors are hereby waived.

8. The Debtors shall file their monthly operating reports required by the Operating Guidelines and Reporting Requirements for Debtors in Possession and Trustees, issued by the U.S. Trustee, in accordance with the applicable Instructions for UST Form 11-MOR: Monthly Operating Report and Supporting Documentation.

9. This Order shall apply to any future filing of any affiliate of the Debtors; *provided, however*, that the Debtors shall file notice with the Court identifying the cases of such affiliates and stating that this Order shall apply to such cases.

10. The requirements set forth in Local Rule 9013-1(b) are satisfied by the contents of the Motion.

11. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

12. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: [●], 2022
[●], New York

[_____]
UNITED STATES BANKRUPTCY JUDGE